

U.S. Department of Justice



*United States Attorney
Eastern District of Missouri*

MICHAEL A. REILLY
Assistant United States Attorney

*Organized Crime Drug Enforcement
Task Force - West Central Region*

Thomas F. Eagleton U.S. Courthouse Direct (314) 539-7723
111 South 10th Street, Rm. 20.333 Office: (314) 539-2200
St. Louis, Missouri 63102 Fax: (314) 539-2312

March 2, 2021

VIA EMAIL

Blaire Dalton
Attorney at Law
53 W. Jackson Blvd.
Suite 1550
Chicago, IL 60604
blairec.dalton@gmail.com
(Attorney for defendant Dillon)

Vadim A. Glozman
Attorney at Law
53 W. Jackson Blvd.
Suite 1410
Chicago, IL 60604
vglozman2@gmail.com
(Attorney for defendant Dillon)

Quinn A. Michaelis
Attorney at Law
73 West Monroe
Suite 106
Chicago, IL 60603
qmichaelis@yahoo.com
(Attorney for defendant Grady)

Josh B. Adams
Attorney at Law
53 W. Jackson Blvd.
Suite 1615
Chicago, IL 60604
josh@adamsdefenselaw.com
(Attorney for Defendant Grady)

Re: **United States v. Velazquez et al.**
Case Number S5-4:15 CR 404 HEA

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Dear Counsel:

This is a request for reciprocal discovery. Pursuant to Rule 16(b)(1)(A), (B) and (C), Federal Rules of Criminal Procedure, the United States hereby requests that:

A. The defendant provide the United States, or permit the United States to inspect and copy or photograph books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at trial.

B. The defendant provide the United States, or permit the United States to inspect and copy or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to his testimony.

C. The defendant provide the United States a written summary of the testimony that the defendant intends to use under Rules 702, 703, or 705, Federal Rules of Evidence, as evidence in trial, which includes a description of the witnesses' opinions, the bases and reasons for those opinions, and the witnesses' qualifications.

Further, pursuant to the provisions of Rule 26.2 the Government requests the defendant and his attorney to provide to the Government any statements of defense witnesses that are in their possession and that relate to the subject matter concerning which the witnesses have testified.

Pursuant to Rule 12.1, the Government requests that the defendant notify the government of any intended alibi defense; specifically, that the defendant was not present at the time, date and place of the offenses listed in the indictment.

The Government requests a response on or before March 11, 2021, in order to determine if there is a need to file its request for a court order to enforce compliance.

Very truly yours,

SAYLER A. FLEMING
United States Attorney

s/ Michael A. Reilly
MICHAEL A. REILLY, #43908MO
Assistant United States Attorney

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